

EXHIBIT D

①
Tribunal de Distrito de los Estados Unidos
Para el Distrito de Puerto Rico

RECEIVED

AUG 20 2021

PRIME CLERK LLC



Sr. Pedro Ruiz Villegas
Peticionario

Caso No. 17-3823-LTS

y/s

Distrito de los Estados Unidos
Para Distrito de Puerto Rico
Peticionado.

Por: Prueba de Reclamo
Sobre Demanda bajo
Titulo III Promesa
Promesa Prop of Claim #9778
Sobre: Moción en Solicitudes
y Requerimiento de Informa
ción.



Moción en Solicitudes y Requerimientos de
Información del Distrito de los Estados Unidos
Para el Distrito de Puerto Rico

Al Honorable Tribunal:

☐ Date Stamped Copy Returned
☐ No Self-Addressed Stamped Envelope
☒ No Copy Provided
FR

Comparece el Peticionario muy Respetuosamente
ante este Honorable Tribunal; Expone que para
la fecha del 6 de Julio del 2021, la Abogada que
estaba encargada del Caso, envió un documento al
que esta Adjunto a esta Moción que redacta
lo Siguiente:

Que el Peticionario muy Respetuosamente
ante este Honorable Tribunal; deja Saber que
la Representante legal del Caso, no es mi Abogada
Actual y le Informo a este Honorable Tribunal
que desde el recibo de esta Moción en
Solicitudes y Requerimientos de Información
esperamos que toda Notificación u Orden

(2)

sea enviada directamente al Peticionario
de epigrafe el Sr. Pedro Ruiz Villegas
Institución Correccional 216 S.H.
Edif - 2

HC-01 Box 71671

Sabana Hoyos, P.R. 00688



2) Que el Peticionario Muy Respetuosamente
ante este Honorable Tribunal; Expone que
el Documento que la Licda; Sonia S. Sierra
Sepúlveda me hizo entrega via Correo
especifica que llego un Documento Adjunto
relacionado al Proof of claim radicado
por este Peticionario ante la Corte de
quiebras en el caso de Promesa y este
Documento Tambien especifica que el
Estado Persigue que la reclamación enviada
por este Servidor sea denegada. bajo un
Argumento de que el Peticionario omitió
Proporsionar Pruebas evidentes para
apoyar un reclamo Asegurado. y por lo
espuesto de la Licda; Sonia S. Sierra no
a Intervenido en el Proceso y por lo cual
se pide que este Honorable Tribunal pueda
brindar una Representación Legal que puede
proseguir los prosedimientos legales del caso
debido a que el Peticionario no puede
Costear una Representación Legal Privada
por las Condiciones economicas que esta
enfrentando, el cual carece de Bienes y
fortuna que puedan Sufragar los gastos
que ocasiona una Representación Legal
Adecuada por lo Tanto se pide que este
Honorable Tribunal Solicite en Motivo de
Indigencia una Representación Legal

3



su consecuencia se pueda proceder
los Estatutos del caso.

3.) Que el Peticionario muy Respetuosamente
ante este Honorable Tribunal; Expone que
los Documentos que han sido enviados por
el Honorable Tribunal le han llegado al
Peticionario en Tiempo retrasado debido
que han sido enviados directamente al
exrepresentante Legal la Licda: Sonia S. Sierra
Sepulveda y Todos los Documentos que este
Honorable Tribunal enviaba al Peticionario
llegaban a sus oficinas y despues la
Licda: Sonia me enviaba dichos Documento
y Cuando el Departamento de Corrección me
los entregaba no tenia el Tiempo suficiente
Para poder cumplir con los Estatutos de limita
ción y por tal motivo es que estoy dejando
saber a este Honorable Tribunal y que
Puedan tener conocimiento de algun retraso
y que Respetablemente me Reconocieran
y que pueda proseguir los procedimientos
de este caso.

4.) Que el Peticionario muy Respetuosamente
ante este Honorable Tribunal; Expone que la
Licda: Sonia S. Sierra, especifica en la
Carta que recibí el 6 de Julio del 2021 en
Donde hay un Argumento de que el Peticionario
orinitio proporcionar pruebas evidentes
Para apoyar un reclamo asegurado.

Respetablemente el Peticionario cumplio
con esos requisitos de pruebas:

Los Cuales fueron los siguientes:



4. Proof of claim so as to be Actually
Received on or Before The Applicable Bar
Date: General Bar Day: May 29, 2018 at
4:00 pm y eso fue enviado para Marzo,
2018

(2) Tribunal de Apelaciones, sobre Revisión
Administrativa caso # PA-9413-14 Codificada
P-16, sobre sobre de Nominas - 31/8/2016 fue
cuando se sometio el Remedio Administrativo

(3) El Peticionario envio el Informe de
transacciones del Continado Desde la fecha del
6/07/2013 hasta 1/17/2014 en el cual se
refleja (7) Nominas. y son las siguientes:

- 1) Nom: Junio, 2013 — \$49.06
- 2) Nom: Julio, 2013 — \$16.00
- 3) Nom:
- 4) Nom: Agosto, 2013 — \$16.80
- 5) Nom: Especial, Mayo, 2013 — \$95.00
- 6) Nom: Ebanisteria, Noviembre, 2013 — \$46.50
- 7) Nom: Septiembre, 2013 — \$100.00

(4) El Peticionario sometio un Remedio Administra-
tivo para la fecha del 16 de Julio del 2014 en
donde especificaba la reclamacion del Pago como
Albañil y me informan que me pagaron como
Trabajador de Mantenimiento en el cual me
tienen que pagar el restante de lo que esta
estipulado Como Trabajador y el Teniente a cargo
mas el jefe de mi Trabajo me informa que
habian Areglado la problematica y que es cuestion
de Espera y llevo mas de (6) años en Espera.
del proceso.



5) Que el Peticionario muy Respetuosamente ante este Honorable Tribunal: Alega que las condiciones a nivel federal las Mociones que han sido Sometidas Tienen que ser Certificadas Language del English.

Muy Respetablemente ante este Honorable Tribunal, el Peticionario deja saber que no tiene los Conocimientos de Poder Certificar la Moción en el idioma en Ingles y le pide a este Honorable Tribunal que le Asigne un Personal que Represente al Peticionario y pueda Traducir los Documentos Sometidas por el Peticionario debido a que el Peticionario Carece de Bienes y fortuna que puedan Sufrir los Costos de honorarios que Causa esta Moción por Motivos de Indigencia.

6) Que el Peticionario muy Respetuosamente ante este Honorable Tribunal: Le informa que para la fecha 11 de julio del 2014, el Peticionario Sometio los Remedios Administrativos y Todo lo que esta relacionado en este Caso de Reclamo de los Pagos de Trabajo Realizados por el Confinado Peticionario, y Además se esta enviando la Dirección exacta donde este Honorable Tribunal puede enviar las Notificaciones o Resoluciones de Orden que emita este Honorable Tribunal.

7) Que este Peticionario muy Respetuosamente ante este Honorable Tribunal: Solicita que este Caso sea Evaluado detalladamente y que en Consideración se proceda los procedimientos y que pueda excusar al Peticionario de las Tardanzas que han Surgido Anteriormente



Por el cual se dejó saber y Esperamos que surja más inconvenientes, al igual solicita que esta Honorable Corte entere que el Estado esta Reclamandose bajo la ley (Promesa) de Quiebras, Cuando Solicitan al Departamento de Corrección que tienen que hacer un Trabajo de Construcción é usan Confinados para dichas Trabajos y el dinero esta Asignado con Anticipación, en el cual si una Compañia Privada finaliza el Trabajo, les otorgan los pagos correspondientes, é por que si un Confinado es quien hace el Trabajo no le pagan y dicen que no hay dinero disponible, Cuando ese dinero ya ha sido Asignado y usan Como excusa que la Junta de Control Fiscal no quiere enviar el dinero y Hacienda se limita a pagar. Por Todo lo cual esperamos que se tome una Investigación sobre el Trabajo que fue realizado y quien otorgo dichos permisos el cual Respectablemente tiene que cumplir con los pagos correspondientes é que hicieron con el dinero Asignado.

Por todo lo cual Pedimos a Este Honorable Tribunal que con lo Planteado se pueda resolver este Asunto y en su consecuencia emitir una Orden "Ha lugar" y que le otorguen los pagos correspondientes.

Certifico que lo expuesto en esta Moción es fiel, exacto y Verdadero y que se le envíe Copia a las partes Pertinentes de la decisión Tomada por este Honorable Tribunal.

Suplica

Que el Peticionario muy Respetuosamente
ante este Honorable Tribunal pide que otorgue
una Vista de Comparecencia a las Partes
si es Necesario y que pueda otorgar una
Representación Legal al Peticionario por
Motivos de Indigencia y que otorgue lo
que por ley proceda bajo las leyes del
Estado Libre Asociado de Puerto Rico.

Muy Respetuosamente Sometido:

Hoy 29 de Julio del 2021
en Sabana Hoyos P.R. 00688



Respetablemente:
* Pedro Ruiz Villegas
Confinado

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO / TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS PARA EL DISTRITO DE PUERTO RICO

MMLID: 503343

RECEIVED
AUG 20 2021
PRIME CLERK

Fill in this information to identify the case (Select only one Debtor per claim form). / Llene esta información para identificar el caso (seleccione sólo un deudor por formulario de reclamación).		
<input checked="" type="checkbox"/> Commonwealth of Puerto Rico El Estado Libre Asociado de Puerto Rico	Case No. 17-bk-03283	Petition Date: May 3, 2017
<input type="checkbox"/> Puerto Rico Sales Tax Financing Corporation (COFINA) La Corporación del Fondo de Interés Apremiante de Puerto Rico	Case No. 17-bk-03284	Petition Date: May 5, 2017
<input type="checkbox"/> Puerto Rico Highways and Transportation Authority La Autoridad de Carreteras y Transportación de Puerto Rico	Case No. 17-bk-03567	Petition Date: May 21, 2017
<input type="checkbox"/> Employees Retirement System of the Government of the Commonwealth of Puerto Rico El Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico	Case No. 17-bk-03566	Petition Date: May 21, 2017
<input type="checkbox"/> Puerto Rico Electric Power Authority La Autoridad de Energía Eléctrica de Puerto Rico	Case No. 17-bk-04780	Petition Date: July 2, 2017

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Modified Official Form 410 / Formulario Oficial 410 Modificado

Proof of Claim / Evidencia de reclamación

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a Title III case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy or subject to confidentiality on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

Lea las instrucciones antes de completar este formulario. Este formulario está diseñado para realizar una reclamación de pago en un caso en virtud del Título III. No utilice este formulario para solicitar el pago de un gasto administrativo que no sea una reclamación que reúna los requisitos para ser tratada como prioridad administrativa conforme al Título 11 § 503(b) (9) del U.S.C. Ese tipo de solicitud debe realizarse de conformidad con el Título 11 § 503 del U.S.C.

Quienes presenten la documentación deben omitir o editar información que reúna los requisitos para ser tratada con privacidad o confidencialidad en este formulario o en cualquier otro documento adjunto. Adjunte copias editadas de cualquier otro documento que respalde la reclamación, tales como pagarés, órdenes de compra, facturas, balances detallados de cuentas en funcionamiento, contratos, resoluciones judiciales, hipotecas y acuerdos de garantías. No adjunte documentos originales, ya que es posible que los documentos adjuntos se destruyan luego de analizarlos. En caso de que los documentos no estén disponibles, explique los motivos en un anexo.

Fill in all the information about the claim as of the Petition Date.

Complete toda la información acerca de la reclamación a la fecha en la que se presentó el caso.

Part 1 / Parte 1	Identify the Claim / Identificar la reclamación
1. Who is the current creditor? ¿Quién es el acreedor actual?	RUIZ VILLEGAS, PEDRO Name of the current creditor (the person or entity to be paid for this claim) Nombre al acreedor actual (la persona o la entidad a la que se le pagará la reclamación) Other names the creditor used with the debtor Otros nombres que el acreedor usó con el deudor

721

2. Has this claim been acquired from someone else?
☒ No / No
☐ Yes. From whom?
Sí. ¿De quién? _____

¿Esta reclamación se ha adquirido de otra persona?

3. Where should notices and payments to the creditor be sent?
Where should notices to the creditor be sent?
¿A dónde deberían enviarse las notificaciones al acreedor?
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)
RUIZ VILLEGAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE, PR 00733-1031
721
787-841-0150
787-841-1055
Contact phone / Teléfono de contacto

Where should payments to the creditor be sent?
(if different)
¿A dónde deberían enviarse los pagos al acreedor? (En caso de que sea diferente)
Pedro Ruiz Villegas
50 carr # unit 501-2A
Industrial Lucretia Boyenmark
City / Ciudad State / Estado ZIP Code / Código postal
00961-2403
Contact phone / Teléfono de contacto

4. Does this claim amend one already filed?
☒ No / No
☐ Yes. Claim number on court claims registry (if known)
Sí. Número de reclamación en el registro de reclamaciones judiciales (en caso de saberlo)
Filed on / Presentada el _____ (MM / DD / YYYY) / (DD / MM / AAAA)

5. Do you know if anyone else has filed a proof of claim for this claim?
☒ No / No
☐ Yes. Who made the earlier filing?
Sí. ¿Quién hizo la reclamación anterior? _____

¿Sabe si alguien más presentó una evidencia de reclamación para esta reclamación?

Part 2 / Parte 2:

Give Information About the Claim as of the Petition Date

Complete toda la información acerca de la reclamación desde la fecha en la que se presentó el caso.

6. Do you have a claim against a specific agency or department of the Commonwealth of Puerto Rico?
☐ No / No
☒ Yes. Identify the agency or department and contact name. (A list of Commonwealth of Puerto Rico agencies and departments is available at: <https://cases.primereclerk.com/puertorico/>.)
Sí. Identifique el organismo o departamento y nombre del representante. (Una lista de agencias y departamentos del Estado Libre Asociado de Puerto Rico está disponible en: <https://cases.primereclerk.com/puertorico/>.)
Institucion Correccional de P.R.

7. Do you supply goods and / or services to the government?
☒ No / No
☐ Yes. Provide the additional information set forth below / Sí. Proporcionar la información adicional establecida a continuación:
Vendor / Contract Number / Número de proveedor / contrato: Int. Correccional.

¿Proporciona bienes y / o servicios al gobierno?

List any amounts due after the Petition Date (listed above) but before June 30, 2017:
Anoté la cantidad que se le debe después de la fecha que se presentó el caso (mencionados anteriormente), pero antes del 30 de junio de 2017 \$ 300.00

8. How much is the claim? \$ 300.00

¿Cuál es el importe de la reclamación?

Does this amount include interest or other charges?

¿Este importe incluye intereses u otros cargos?

☒ No / No

☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

Sí. Adjunte un balance con intereses detallados, honorarios, gastos u otros cargos exigidos por la Norma de Quiebras 3001(c)(2)(A).

9. What is the basis of the claim?

¿Cuál es el fundamento de la reclamación?

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.

Por ejemplo: Venta de bienes, préstamo de dinero, arrendamiento, prestación de servicios, lesiones personales u homicidio culposo, o tarjetas de crédito. Adjunte copias editadas de cualquier documento que respalde la reclamación conforme a lo exigido por la Norma de Quiebras 3001(c). Limite la divulgación de información que reúne los requisitos para ser tratada con privacidad, tal como información sobre atención médica.

prestación de servicios.

10. Is all or part of the claim secured?

¿La reclamación está garantizada de manera total o parcial?

☐ No / No

☒ Yes. The claim is secured by a lien on property.

Sí. La reclamación está garantizada por un derecho de retención sobre un bien.

Nature of property / Naturaleza del bien:

☐ Motor vehicle / Vehículos

☐ Other. Describe:

Otro. Describir:

pago de nóminas

Basis for perfection / Fundamento de la realización de pasos adicionales: _____

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Adjunte copias editadas de documentos, si los hubiere, que demuestre la realización de pasos adicionales para hacer valer un derecho de garantía (por ejemplo, una hipoteca, un derecho de retención, un certificado de propiedad, una declaración de financiamiento u otro documento que demuestre que se ha presentado o registrado un derecho de retención.

Value of property / Valor del bien: \$ _____

Amount of the claim that is secured /

Importe de la reclamación que está garantizado: \$ 300.00

Amount of the claim that is unsecured /

Importe de la reclamación que no está garantizado: \$ _____

(The sum of the secured and unsecured amounts should match the amount in line 7.)

(La suma del importe garantizado y no garantizado debe coincidir con el importe de la línea 7.)

Amount necessary to cure any default as of the Petition Date /

Importe necesario para compensar toda cesación de pago a la fecha que se presentó el caso : \$ _____

Annual Interest Rate (on the Petition Date)

Tasa de interés anual (cuando se presentó el caso) _____ %

☐ Fixed / Fija

☐ Variable / Variable

11. Is this claim based on a lease?

¿Esta reclamación está basada en un arrendamiento?

☒ No / No

☐ Yes. Amount necessary to cure any default as of the Petition Date.

Sí. Importe necesario para compensar toda cesación de pago a partir de la que se presentó el caso \$ _____

12. Is this claim subject to a right of setoff?

☐ No / No

☒ Yes. Identify the property /

Sí. Identifique el bien:

¿La reclamación está sujeta a un derecho de compensación?

prop. de vivienda por m. trabajo especial.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

☒ No / No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the Petition Date in these Title III case(s), in which the goods have been sold to the debtor in the ordinary course of such debtor's business. Attach documentation supporting such claim.

¿La reclamación, total o parcial, cumple los requisitos para ser tratada como prioridad administrativa conforme al Título 11 § 503(b)(9) del U.S.C.?

Sí. Indique el importe de la reclamación que surge del valor de cualquier bien recibido por el deudor dentro de los 20 días anteriores a la fecha de inicio en estos casos del Título III, en el que los bienes se han vendido al deudor en el transcurso normal de los negocios del deudor. Adjunte la documentación que respalda dicha reclamación.

Part 3 / Parte 3:

Sign Below / Firmar a continuación

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

La persona que complete esta evidencia de reclamación debe firmar e indicar la fecha. FRBP 9011(b).

Si presenta esta reclamación de manera electrónica, la FRBP 5005(a)(2) autoriza al tribunal a establecer normas locales para especificar qué se considera una firma.

Check the appropriate box / Marque la casilla correspondiente:

☒ I am the creditor. / Soy el acreedor.

☐ I am the creditor's attorney or authorized agent. / Soy el abogado o agente autorizado del acreedor.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004. / Soy el síndico, el deudor o su agente autorizado. Norma de quiebra 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005. / Soy el garante, fiador, endosante u otro codeudor. Norma de quiebra 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

Comprendo que una firma autorizada en esta Evidencia de reclamación se considera como un reconocimiento de que al calcular el importe de la reclamación, el acreedor le proporcionó al deudor crédito para todo pago recibido para saldar la deuda.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

He leído la información en esta Evidencia de reclamación y tengo motivos razonables para suponer que la información es verdadera y correcta.

I declare under penalty of perjury that the foregoing is true and correct. / Declaro bajo pena de perjurio que lo que antecede es verdadero y correcto.

Executed on date / Ejecutado el _____ (MM/DD/YYYY) / (DD/MM/AAAA)

Signature / Firma

Pedro Ruiz Villegas

Print the name of the person who is completing and signing this claim / Escriba en letra de imprenta el nombre de la persona que completa y firma esta reclamación:

Name

Pedro Roberto Ruiz Villegas

First name / Primer nombre

Middle name / Segundo nombre

Last name / Apellido

Title / Cargo

confirado

Company / Compañía

Institución Correccional P.R.

Identify the corporate servicer as the company if the authorized agent is a servicer.

Identifique al recaudador corporativo como la compañía si el agente autorizado es un recaudador.

Address / Dirección

50 carr 5ª int 501

Number / Número

Street / Calle

Industrial Techetto

City / Ciudad

Bayamon PR

State / Estado

ZIP Code / Código postal

00961-2403

Contact phone / Teléfono de contacto

Email / Correo electrónico

***CUST PR 1845 SRF 54642 PackID: 240 MMLID: 503343-P Svc: 345
RUIZ VILLEGAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE PR 00733-1031

JUN 28 2021

BDN Puerto Rico 1845 SRF 22380 SVC: MML PACK ID: 33716 MML ID: 503343

F2R4-0033721

RUIZ VILLEGAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE, PR 00733-1031

PLEASE SEND COMPLETED PROOF(S) OF CLAIM SO AS TO BE ACTUALLY RECEIVED ON OR BEFORE THE APPLICABLE BAR DATE:

General Bar Date: May 29, 2018 at 4:00 p.m., Atlantic Standard Time

Please send completed Proof(s) of Claim to:

If by first class mail:

Commonwealth of Puerto Rico
Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4708
New York, NY 10163-4708

If by overnight courier or hand delivery/Para enviar por mensajería o entrega al siguiente día:

Refer to "Section 6 -- Where and How to File" in the enclosed notice for additional locations in the Commonwealth accepting hand delivery of completed proof of claim forms.

Consulte la "Sección 6: Para ver dónde y cómo presentar su formulario" del aviso adjunto. Habrán varias ubicaciones en el Commonwealth donde se aceptara la entrega de estos formularios de prueba de reclamo completados.

If you have questions about this notice, please call (844) 822-9231 (US toll free), (646) 486-7944 (international), email PuertoRicoInfo@primeclerk.com, or visit <https://cases.primeclerk.com/puertorico>

Si tiene preguntas acerca de este aviso, llame al (844) 822-9231 (local), (646) 486-7944 (internacional), envíe un correo electrónico a PuertoRicoInfo@PrimeClerk.com, o visite <https://cases.primeclerk.com/puertorico>

You may also submit your claim electronically by visiting <http://cases.primeclerk.com/puertorico/EPOC-Index>

También puede enviar su reclamo electrónicamente visitando <http://cases.primeclerk.com/puertorico/EPOC-Index>

IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
RUIZ VILLEGAS, PEDRO	9778	5/1/2018	Commonwealth of Puerto Rico	\$300.00
Reason:	The claimant failed to provide prima facie evidence to support a secured claim.			

SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES SOLICITAN QUE SU RECLAMO SEÁ RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
RUIZ VILLEGAS, PEDRO	9778	5/1/2018	Commonwealth of Puerto Rico	\$300.00
Base para:	El demandante omitió proporcionar pruebas evidentes para apoyar un reclamo asegurado.			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. **If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).**

Copias de la Objeción global, y todos los escritos radicados en el marco de las causas conforme al Título III, están disponibles, de manera gratuita, en <https://cases.primeclerk.com/puertorico>. Si tiene alguna pregunta, comuníquese con Prime Clerk LLC llamando al (844) 822-9231 (número gratuito para Estados Unidos y Puerto Rico) o (646) 486-7944 (para llamadas desde el extranjero), disponible entre las 10:00 a.m. y las 07:00 p.m. (AST) (hablamos español).

from: Pedro Ruiz Villegas 2-H10
Int. Cor. 216 S-H
HC-01 Box 71621
Sabana Hoya, PR. 00688



Drug Free USA



RECEIVED
AUG 20 2021
PRIME CLERK LLC

To: Commonwealth of Puerto Rico
Claims Processing Center
c/o: Prime Clerk LLC
Grand Central Station, P.O. Box 4708
New York, NY 10163-4208

101634208 8068

(1)

*United States District Court
for the District of Puerto Rico*

[stamp:] RECEIVED
AUG 20 2021
PRIME CLERK LLC

[seal:]
Sabana Hoyos Correctional Institution
Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
AND REHABILITATION
PUERTO RICO
216
Criminal Record

*Mr. Pedro Ruiz Villegas
Petitioner*

vs.

*United States District [Court]
For the District of Puerto Rico
Respondent*

Case No. 17-3823-LTS

*For: Proof of Claim on Lawsuit under Title III,
PROMESA [Puerto Rico Oversight, Management,
and Economic Stability Act]
PROMESA Proof of Claim # 9778
on Motion on Petition and Request for
Information*

[barcode:]
170328380104701

*Motion on Petition and Requests for Information from the United States District [Court]
for the District of Puerto Rico*

To the Honorable Court

☐ Date Stamped Copy Returned
☐ No Self-Addressed Stamped Envelope
☒ No Copy Provided

*The Petitioner now most respectfully appears before this Honorable Court. He states that on
July 6, 2021, the attorney who was in charge of the case sent a document which is attached to this motion.
This motion reads as follows:*

*1) The Petitioner most respectfully informs this Honorable Court that the legal representative of
the case is not my current attorney, and I hereby inform this Honorable Court that as of the receipt of this
Motion on Petition and Request for Information we expect all notifications or orders*

(2)

to be sent directly to the Petitioner identified in the caption,

Mr. Pedro Ruiz Villegas

Institución Correccional 216 S.H.

Edif. – 2

HC-01 Box 71671

Sabana Hoyos, PR 00688

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2) The Petitioner most respectfully states to this Honorable Court that the document Attorney Sonia S. Sierra Sepúlveda sent me by mail specifies that an attached document arrived related to the Proof of Claim filed by this Petitioner with the Bankruptcy Court in the PROMESA case, and said document also specifies that the Commonwealth is seeking to disallow the claim I sent, by arguing the Petitioner failed to provide prima facie evidence to support a secured claim. According to what Attorney Sonia S. Sierra stated, she has not intervened in the case. It is therefore requested that this Honorable Court provide a legal representation that will be able to pursue the appropriate legal procedures, due to the fact that the Petitioner cannot afford the cost of Private Legal Representation, on account of the economic conditions he is facing. He has no assets or wealth to defray the expenses occasioned by an adequate legal representation. He therefore petitions that this Honorable Court, based on Indigency, request a legal representation

(3)

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and thus be able to proceed with the applicable Statutes [sic].

3) The Petitioner most respectfully appears before this Honorable Court and states that the documents that have been sent by the Honorable Court have been received by the Petitioner with a delay in time, because they have been sent directly to the legal representative, Attorney Sonia S. Sierra Sepúlveda, and all the documents this Honorable Court was sending to the Petitioner arrived at her offices. And after that Attorney Sonia would send those documents to me. And when the Department of Correction would give them to me, I did not have sufficient time to comply with the Statutes of Limitation. For that reason, I am making it known to this Honorable Court and so that you may be aware of any delay, and that you respectfully reconsider me, and allow me to pursue the procedures in this case.

4) The Petitioner most respectfully states to this Honorable Court that Attorney Sonia S. Sierra makes a statement in the letter I received on July 6, 2021, where there is an argument that the Petitioner failed to provide prima facie evidence to support a secured claim.

Respectfully, the Petitioner met those evidentiary requirements:

Which were as follows:

(4)

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*(1) Proof of Claim so as to be Actually Received on or Before the
Aplicable [sic] Bar Date: General Bar Day: May 29, 2018 at 4:00 p.m.
It was sent on March 2, 2018.*

*(2) Court of Appeals, regarding Administrative Review, Case # PA-9413-94, Codified P-16,
regarding collection of Payroll – 8/31/16, which is when the Administrative Remedy was
submitted.*

*(3) The Petitioner sent the Report of Transactions of the Inmate as of 6/07/2013 and up until
1/17/2014, which reflects (7) payroll periods, which are as follows:*

- 1) Payroll: June 2013 – \$49.16*
- 2) Payroll: July 2013 – \$16.00*
- 3) Payroll:*
- 4) Payroll: August 2013 – \$16.80*
- 5) Payroll: Special, May 2013 – \$95.00*
- 6) Payroll: Carpentry, November 2013 – \$46.50*
- 7) Payroll: September 2013 – \$100.00*

*(4) The Petitioner submitted an Administrative Remedy on July 16, 2014, which specified a claim
for payment as a construction worker, and I was informed that I was paid as a maintenance
worker, on which they have to pay me the rest of what is stipulated as a worker, and the
Lieutenant in charge plus the boss for my work are telling me that they had fixed the problem,
and that it's a matter of waiting, and I've been waiting for more than (6) years of the process.*

(5)

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5) *The Petitioner most respectfully alleges to this Honorable Court that the conditions at the Federal level of motions that have been submitted have to be certified in the English language.*

The Petitioner most respectfully makes known to you that he does not have the knowledge to be able to certify the Motion in the English language, and he asks this Honorable Court to assign a person to him to represent the Petitioner and be able to translate the documents submitted by the Petitioner, given that the Petitioner lacks the assets and wealth to be able to defray the costs of the professional fees generated by this Motion, due to Indigency.

6) *The Petitioner most respectfully informs this Honorable Court that on July 16, 2014, the Petitioner submitted the Administrative Remedies and everything related to this case of a Claim for Payment of Work performed by the inmate Petitioner. I am also sending the exact address where this Honorable Court can send the Notifications or Order Decisions issued by this Honorable Court.*

7) *The Petitioner most respectfully requests of this Honorable Court that this case be evaluated in detail, and that in consideration thereof, the procedures go forward, and that the Petitioner may be excused for the lateness that has occurred before,*

(6)

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of which I informed you, and we hope that more problems do not occur.

It is also requested that this Honorable Court become aware that the Commonwealth is making a claim under the law (PROMESA) on bankruptcy. When the Department of Correction is asked that they have to do construction work and they use inmates for that work, and the money is allocated in advance, on which, if a private company finishes the work, they give them the corresponding payments. Why, if an inmate is the one that does the work, don't they pay him? And they say that there is no money available, when that money has already been allocated, and they use, as an excuse, that the Fiscal Control Board does not want to send the money and the Treasury limits itself in paying. For all these reasons we hope that an investigation will be made on the work that was done and who granted these permits and respectfully has to make the corresponding payments, or what did they do with the allocated money?

For all of the foregoing reasons, we ask this Honorable Court, with what is stated above, to decide this matter, and, as a consequence, issue an order "finding merit," and granting the corresponding payments.

I certify that what is set forth in this motion is true, accurate, and correct, and [ask] that a copy of the decision taken by this Honorable Court be sent to the pertinent parties.

(7)

Prayer for Relief

The Petitioner most respectfully prays to this Honorable Court that it grant a hearing for the Parties to appear, if necessary, and to be able to grant the Petitioner a Legal Representation on the Grounds of Indigency, and to grant what is legally appropriate under the laws of the Commonwealth of Puerto Rico.

Most respectfully submitted.

This 29th day of July of 2021

in Sabana Hoyos PR 00688

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Sabana Hoyos Correctional Institution
Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
AND REHABILITATION
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Respectfully,

** Pedro Ruiz Villegas*

Inmate

You may also submit your claim electronically by visiting <http://cases.primeclerk.com/puertorico/EPOC-Index>

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Fill in this information to identify the case (Select only one Debtor per claim form).		
<input checked="" type="checkbox"/> Commonwealth of Puerto Rico	Case No. 17-bk-03283	Petition Date: May 3, 2017
<input type="checkbox"/> Puerto Rico Sales Tax Financing Corporation (COFINA)	Case No. 17-bk-03284	Petition Date: May 5, 2017
<input type="checkbox"/> Puerto Rico Highways and Transportation Authority	Case No. 17-bk-03567	Petition Date: May 21, 2017
<input type="checkbox"/> Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Case No. 17-bk-03566	Petition Date: May 21, 2017
<input type="checkbox"/> Puerto Rico Electric Power Authority	Case No. 17-bk-04780	Petition Date: July 2, 2017

MMLID: 503343

[stamp:] RECEIVED
AUG 20 2021
PRIME CLERK

721

Modified Official Form 410

Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a Title III case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy or subject to confidentiality on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

Read the instructions before filling out this form. This form is for making a claim for payment in a Title III case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy or subject to confidentiality on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after being analyzed. If the documents are not available, explain in an attachment.

Fill in all the information about the claim as of the Petition Date.

Fill in all the information about the claim as of the Petition Date.

Part 1	Identify the Claim
1. Who is the current creditor?	<div>RUIZ VILLEGAS, PEDRO</div> <div>Name of the current creditor (the person or entity to be paid for this claim) 721</div> <div>Other names the creditor used with the debtor</div>

8. How much is the claim? \$ <u>300.00</u>	Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A). Yes. Attach a statement with itemized interest, as well as professional fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
9. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <div style="text-align: center;"><u>Provision of services</u></div>	
10. Is all or part of the claim secured? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Motor vehicle / Vehicles <input type="checkbox"/> Other. Describe: <u>payment of payroll</u> Basis for perfection _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured \$ <u>300.00</u> Amount of the claim that is unsecured \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.) Amount necessary to cure any default as of the Petition Date \$ _____ Annual Interest Rate (on the Petition Date) ____% <input type="checkbox"/> Fixed <input type="checkbox"/> Variable	
11. Is this claim based on a lease? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the Petition Date \$ _____	

<p>12. Is this claim subject to a right of setoff?</p>	<p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes, Identify the property <u>Payment of payroll for special work.</u></p>
<p>13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?</p>	<p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Indicate the amount of your claim arising from the value of any goods \$ _____ received by the debtor within 20 days before the Petition Date in these Title III case(s), in which the goods have been sold to the debtor in the ordinary course of such debtor's business. Attach documentation supporting such claim.</p>
<p>Part 3</p>	<p>Sign below</p>
<p>The person completing this proof of claim must sign and date it. FRBP 9011(b).</p> <p>If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.</p> <p>The person completing this proof of claim must sign and date it. FRBP 9011(b).</p> <p>If you file this claim electronically, FRBP 5005(a)(2) authorizes the court to establish local rules specifying what is deemed to constitute a signature.</p>	<p><i>Check the appropriate box</i></p> <p><input checked="" type="checkbox"/> I am the creditor.</p> <p><input type="checkbox"/> I am the creditor's attorney or authorized agent.</p> <p><input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.</p> <p><input type="checkbox"/> I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.</p> <p>I understand that an authorized signature on this <i>Proof of Claim</i> serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.</p> <p>I have examined the information in this <i>Proof of Claim</i> and have a reasonable belief that the information is true and correct.</p> <p>I have read the information in this <i>Proof of Claim</i> and I have reasonable grounds to assume that the information is true and correct.</p> <p>I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on date / Executed on _____ (MM/DD/YYYY)</p> <p>Signature <u>[signature]</u></p> <p>Print the name of the person who is completing and signing this claim:</p> <p>Name _____</p> <div style="display: flex; justify-content: space-between; width: 100%;"> First name Middle name Last name </div> <p>Title _____ <i>inmate</i></p> <p>Company _____ <i>Correctional Institution, Puerto Rico</i></p> <p style="text-align: center; font-size: small;">Identify the corporate servicer as the company if the authorized agent is a servicer.</p> <p>Address <u>50 Carr # Unit 501-I-A</u></p> <div style="display: flex; justify-content: space-between; width: 100%;"> Number Street </div> <div style="display: flex; justify-content: space-between; width: 100%; margin-top: 10px;"> <u>Industrial Luchetti</u> <u>Bayamon</u> <u>PR 00961-7403</u> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> City State ZIP Code </div> <p>Contact phone _____ Email _____</p>

***CUST PR 1845 SRF 54642 PackID: 240 MMLID: 503343-P Svc: 345
RUIZ VILLEGAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE PR 00733-1031

JUN 28 2021

MAR 02

BDN Puerto Rico 1845 SRF 22380 SVC: MML PACK ID: 33716 MML ID: 503343

F2R4-0033721
RUIZ VILLEGAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE, PR 00733-1031

PLEASE SEND COMPLETED PROOF(S) OF CLAIM SO AS TO BE ACTUALLY RECEIVED ON OR BEFORE THE
APPLICABLE BAR DATE:

General Bar Date: May 29, 2018 at 4:00 p.m., Atlantic Standard Time

Please send completed Proof(s) of Claim to:

If by first class mail:
Commonwealth of Puerto Rico
Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4708
New York, NY 10163-4708

If by overnight courier or hand delivery:

Refer to "Section 6 -- Where and How to
File" in the enclosed notice for additional
locations in the Commonwealth accepting
hand delivery of completed proof of claim
forms.

Refer to "Section 6: To See Where and How
to File your Form." There will be several
locations in the Commonwealth where the
delivery of these proof of claim form will be
accepted.

If you have questions about this notice, please call (844) 822-9231 (US toll free), (646) 486-7944 (international),
email PuertoRicoInfo@primeclerk.com, or visit <https://cases.primeclerk.com/puertorico>

You may also submit your claim electronically by visiting <http://cases.primeclerk.com/puertorico/EPOC-Index>

**IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING
TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.**

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
RUIZ VILLEGAS, PEDRO	9778	5/1/2018	Commonwealth of Puerto Rico	\$300.00
Reason:	The claimant failed to provide prima facie evidence to support a secured claim.			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. **If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).**

Copies of the Omnibus Objection and all filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. **If you have a question, contact Prime Clerk LLC by calling (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for overseas callers), available 10:00 a.m. to 7:00 p.m. (AST) (we speak Spanish).**

From: Pedro Ruiz Villegas 2-H10
Int. Cor. 216 S-H
HC-01 Box 71671
Sabana Hoya PR 00688



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To: Commonwealth of Puerto Rico
Claims Processing Center
% Prime Clerk LLC
Grand Central Station, P.O. Box 4708
New York, NY 10163-4208

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